

Exhibit A



Bettina Roberts <bettina@nsbcivilrights.com>

Sanford: conference call re motions in limine

Amelia Green <amelia@nsbcivilrights.com>

Tue, Feb 19, 2019 at 5:29 PM

To: Joe Seward <jseward@sewardhenderson.com>, Michael Berger <MBerger@sewardhenderson.com>
Cc: Emma Freudenberger <emma@nsbcivilrights.com>, Nick Brustin <nick@nsbcivilrights.com>, Oscar Hurtado <oscar@nsbcivilrights.com>, Julie Hurwitz <JHurwitz@goodmanhurwitz.com>, William Goodman <bgoodman@goodmanhurwitz.com>, Bettina Roberts <bettina@nsbcivilrights.com>, Laurel Van Etten-Seale <lseale@goodmanhurwitz.com>

Joe and Mike,

In follow up to our call last week, we do not intend to seek to introduce evidence of the Detroit consent decree at the upcoming trial against Tolbert and Russell. That being said, we note that there is an appealable issue regarding *Monell* liability and we do not waive the right to use evidence of the consent decree in relation to that claim.

To the extent there are any other outstanding questions regarding Plaintiff's positions, we do not concur in any of the other motions in limine you discussed with us at this time.

Thanks,
Amelia

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